

**From:** [Christine Crawford](#)  
**To:** [BOCrfc2015](#)  
**Subject:** Broadband Opportunities Council Comments Yolo LAFCo 06.10.15.docx  
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**Attachments:** [Broadband Opportunities Council Comments Yolo LAFCo 06.10.15.docx](#)

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**To:** Broadband Opportunities Council

**From:** Christine M. Crawford, AICP, Executive Officer

**Re:** Broadband Opportunities Council Request for Comments

**Date:** June 10, 2015

### Introduction and Background

Thank you for the opportunity to submit comments to the Broadband Opportunities Council on ways to clear regulatory barriers and identify existing programs which can be modified to support and promote broadband deployment nationwide. I commend President Obama on his action to address the very critical issue of access to broadband through the creation of the Broadband Opportunity Council.

The Yolo Local Agency Formation Commission is a state-mandated agency unique to California (each of our 58 counties has one) created with the mission to provide efficient government services, among others. Our agency is in the unique position of being able to collaborate together with our four cities and unincorporated communities on broadband issues for our region and has just completed the Yolo Broadband Strategic Plan for our communities countywide.

Yolo County is 1,023 acres in size and our population of approximately 200,000 lies on only 5% of this area. Therefore, although the County is immediately adjacent to our State Capitol and only 50 miles from Silicon Valley, we are relatively rural and are experiencing significant issues with lack of broadband deployment by private providers.

### Comments

The Request for Comment seeks comments on the following questions:

***How can the federal government best promote coordination and use of federally-funded broadband assets?***

Clarify that a portion of federal funding from all of the BOC agencies can be used to install broadband infrastructure. In particular, transportation projects funded through DOT should be required to install conduit or fiber made available for government or private provider use.

E-Rate should be allowed to connect communities, not just individual building sites. For example, children in the City of Winters have been provided iPads at school but are unable to utilize them at home due to lack of broadband in the surrounding community.

Land and structures owned by the federal government should be made available for wireless facilities, similar to how the State of California issued a map of available sites. In addition, there must be a streamlined process for leasing such sites so as not to hinder use.

***What regulatory barriers exist within the agencies of the Executive Branch to the deployment of broadband infrastructure?***

BTOP funding was used to create the CENIC network in California; however this network is only available to school and library sites. If federal monies are being used to deploy broadband, infrastructure should be made available to all local public agencies for use to serve entire communities (not just one building).

***Are there specific regulations within the agencies of the Executive Branch that impede or restrict competition for broadband service?***

Consider creating an exemption for broadband related infrastructure projects from NEPA.

Remove any regulations that allow existing provider incumbents to protest grant funding to a project within their service area that would result in competition.

***How can communities and regions incentivize service providers to offer broadband services, either wired or wireless, in rural and remote areas?***

Clarify that local public agencies (all types) are authorized to provide broadband services. In California, Community Service Districts are specifically authorized to provide broadband service; however, it's unclear if County Service Areas are or not. It's exceedingly difficult to get legislation passed in California (or anywhere) with the powerful telecom lobby, so having federal legislation in place would be helpful.

***What can the federal government do to make it easier for state, local, and tribal governments or organizations to access funding for broadband?***

The definition of "rural" under the Farm Bill excludes ALL our rural communities in Yolo County. Our proximity to the metropolitan area of Sacramento unfairly excludes us from

many grant programs such as USDA and First Net. Due to the physical barrier of the Sacramento River and our strong history in agricultural preservation, there is not a concentric ring of urbanization around Sacramento to the west that includes Yolo County.

The federal grant process in itself is extremely cumbersome such that rural communities do not have the resources to get through the grant process. The local providers we talk to are unwilling to go through the grant process because the funds are not enough to be worth it.

Consider federal loan programs to local government and organizations.